



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590  
NOV 13 2014

**CERTIFIED MAIL 7009 1680 0000 7663 6438**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Ms. Dawn Breznai  
Environment, Health, and Safety Manager  
Chrysler Group, LLC – Jefferson North Assembly Plant  
2101 Conner Street  
Detroit, Michigan 48415

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA ID: MID985569987

Dear Ms. Breznai:

On September 11-12, 2014, representatives of the U.S. Environmental Protection Agency and Michigan Department of Environmental Quality inspected the Chrysler Group, LLC, Jefferson North Assembly Plant ("Chrysler - JNAP") located in Detroit, Michigan. As a large quantity generator of hazardous waste, Chrysler - JNAP is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Chrysler - JNAP's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Chrysler - JNAP, EPA's review of records pertaining to Chrysler - JNAP, and the inspector's observations, EPA has determined that Chrysler - JNAP has unlawfully stored hazardous waste without a license or interim status as a result of Chrysler - JNAP's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption condition with which Chrysler - JNAP was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 1 is also an independent TSD requirement incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o). Accordingly, each failure of Chrysler - JNAP to comply with these conditions is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)



(m)-(o) [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Mich. Admin. Code. r. 299.9601(1) and (2) and 299.11003(1) (p) and (q) [40 C.F.R. Part 264] (if the facility should have been licensed).

Finally, EPA has determined that Chrysler - JNAP violated RCRA requirements related to universal waste, as described in paragraph 2, below.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, Chrysler - JNAP was out of compliance with the following large quantity generator license exemption condition, which is also a violation of an independent TSD requirement:

##### **1. Written Hazardous Waste Tank Assessment**

Under Mich. Admin. Code r. 299.9306(1)(a)(ii); 40 C.F.R. 265 Subpart J [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192(b)], a large quantity generator that owns or operates a new hazardous waste tank system must ensure that proper handling procedures are adhered to in order to prevent damage to the system during installation. Prior to covering, enclosing, or placing a new tank system or component in use, a qualified individual must inspect the system or component for weld breaks, punctures, scrapes, cracks, corrosion or other structural damage or inadequate construction or installation. Under Mich. Admin. Code r. 299.9306(1)(a)(ii); 40 C.F.R. 265 Subpart J [40 C.F.R. 262.34(a)(1)(ii) and 265.192(g)], the owner or operator must also keep on file the written statements attesting to the proper installation of the tank system according to the requirements outlined above.

At the time of the inspection, Chrysler - JNAP did not have a written hazardous waste tank system installation assessment for its hazardous waste tank containing spent purge solvents.

Note: The tank was installed in 1991 and put in service in 1992. A new tank system is one that had been installed or was licensed for install by July 14, 1986.

Summary: By failing to comply with the condition for a license exemption, above, Chrysler - JNAP became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. Chrysler - JNAP failed to apply for such a license. Chrysler - JNAP's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o) is also an independent violation of the corresponding TSD requirement.

## UNIVERSAL WASTE VIOLATIONS

Chrysler - JNAP violated the following generator requirement:

### 2. Universal Waste Requirement

Under Mich. Admin. Code r. 299.9228(4)(f)(ii) a small quantity handler of universal waste must label the outer packaging or container with the words "universal waste consumer electronics" or "universal waste electronics."

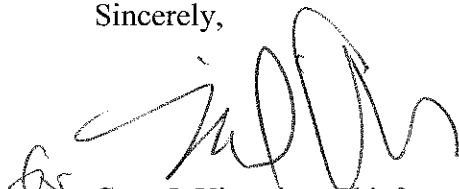
At the time of the inspection, Chrysler - JNAP's container of consumer electronics located in the Body Shop was not labeled with the phrase "universal waste consumer electronics" or "universal waste electronics."

At this time, EPA is not requiring Chrysler - JNAP to apply for an Michigan hazardous waste storage license so long as it immediately establishes compliance with the condition for a license exemption outlined in paragraph 1, above.

After the inspection, as documented in a September 23, 2014 email to EPA, you took certain actions to establish compliance with the universal waste requirement identified in item 2, above. Your email did not include any actions you may have taken related to the license exemption condition identified in item 1, above. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to item 1. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at [whitney.brenda@epa.gov](mailto:whitney.brenda@epa.gov).

Sincerely,

  
for Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Noelle Grain, MDEQ - [GrainN@Michigan.gov](mailto:GrainN@Michigan.gov)  
James Day, MDEQ - [DayJ@Michigan.gov](mailto:DayJ@Michigan.gov)  
Lonnie Lee, MDEQ - [LeeL@Michigan.gov](mailto:LeeL@Michigan.gov)  
John Craig, MDEQ - [CraigJ@Michigan.gov](mailto:CraigJ@Michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**Compliance Evaluation Inspection Report**

**Date of Inspection:** September 11-12, 2014

**Facility Name:** Chrysler Group, LLC

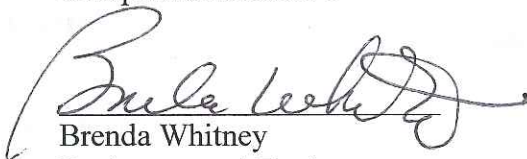
**Facility Address:** 2101 Conner Street  
Detroit, Michigan 48415

**EPA RCRA ID Number:** MID985569987


**Generator Status:** Large Quantity Generator

**Facility Contact:** Dawn Breznai  
Environment, Health, and Safety Manager

**U.S. EPA RCRA Inspector:** Brenda Whitney - Environmental Engineer  
Resource Conservation and Recovery Act  
Land and Chemicals Division  
Compliance Section 2

**Prepared By:**   
Brenda Whitney  
Environmental Engineer

**Date Completed:** 10/15/14  
Month / Day / Year

**Accepted By:**   
Julie Morris  
Chief, Compliance Section 2

**Date Accepted:** 10/16/14  
Month / Day / Year

### **Purpose of Inspection**

I conducted an unannounced Compliance Evaluation Inspection (CEI) of the Chrysler Group, LLC, Jefferson North Assembly Plant (“Chrysler” or “Facility”) located in Detroit, Michigan on September 11-12, 2014. This CEI was an evaluation of Chrysler’s compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. Chrysler was operating as a large quantity generator. Noelle Grain of the Michigan Department of Environmental Quality (MDEQ) accompanied me for the first day of this inspection. Jim Day of the MDEQ accompanied me on the second day. The following people were present for part or all of this inspection:

### **Participants**

<b>Dawn Breznai</b> Environment, Health and Safety Manager	<b>Chrysler</b>
<b>Andy Whitsitt</b> Environmental Specialist (CAA)	<b>Chrysler</b>
<b>Michael Wallison</b> Environmental Specialist (RCRA and CWA)	<b>Chrysler</b>
<b>Michael Bauman</b> Compliance Specialist – Waste (Corporate Office)	<b>Chrysler</b>
<b>Noelle Grain</b> Environmental Quality Analyst	<b>MDEQ</b>
<b>James Day</b> Environmental Quality Analyst	<b>MDEQ</b>
<b>Brenda Whitney</b> Environmental Engineer	<b>EPA</b>

### **Introduction**

Upon arrival at Chrysler, Ms. Grain and I were escorted into the Facility by Ms. Breznai. We displayed official identification to Ms. Breznai and exchanged business cards. Mr. Whitsitt joined us in Ms. Breznai’s office, and Mr. Wallison joined the group approximately 20 minutes later, as he was at a different facility at our arrival time. The purpose and logistics of the CEI were delineated to the Chrysler representatives, and we discussed Chrysler’s hazardous waste generation sources and management methods. I informed the Chrysler representatives that I would be taking photographs during the CEI as needed. I provided the following compliance

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# Appendix A

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## Photograph Log

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**Inspection Date:**

September 11 – 12, 2013

**Facility Name and ID Number:**

Chrysler Group, LLC

Jefferson North Assembly Plant

EPA ID: MID985569987

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Camera Used:**

Nikon Cool Pix P4 VR

Serial Number: 30530701

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Photograph 1 – Universal waste was stored in the Body Shop in containers. The black plastic container on the left held used lamps. The metal container on the right held consumer electronics and lead-acid batteries.



Photograph 2 – The black container identified in Photograph 1 was labeled as “Universal Waste – Lamps” and was marked with a start date of accumulation from 7-11-14.



Photograph 3 – The metal container identified in Photograph 1 was labeled as “Universal Waste” and “Lead Acid Batteries” with a 3-28-14 start date of accumulation.

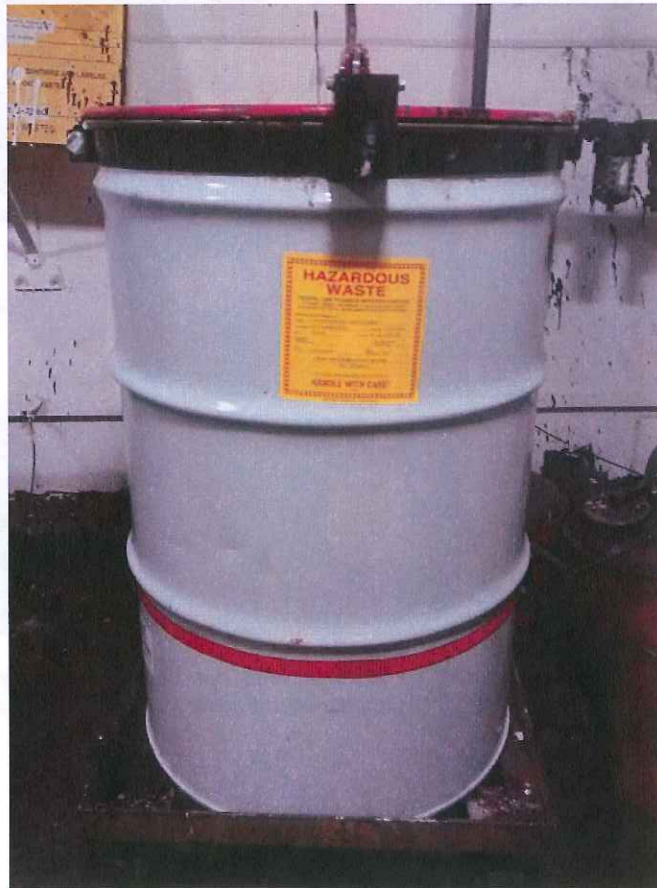


Photograph 4 – A 55-gallon drum of gasoline and debris was located in “Heavy Repair.” The container was labeled and closed.





Photograph 5 – A tote of “Used Oil and Antifreeze” was located in “Heavy Repair.”



Photograph 6 – Spent solvent from a cold partswasher in the Low-Bake area was collecting in a 55-gallon drum. The container was labeled and closed.



*Photograph 7— Containers of hazardous waste were kept on pallets in the 90-day storage area. The containers were each labeled, closed, and marked with start dates of accumulation.*



*Photograph 8— Discarded gas tanks were stored in the 90-day storage area. These tanks had been emptied into some of the drums identified in Photograph 7. The tanks were still being managed as hazardous waste.*





*Photograph 9 – A tote of universal waste lamps was stored in the 90-day area. The tote was labeled, dated, and closed.*



*Photograph 10 – Lead-acid batteries were stored on pallets in the 90-day storage area. The pallets were labeled and marked with start dates of accumulation.*



Photograph 11 – Close-up of the labeled pallet as identified in Photograph 10.



Photograph 12 – The “Sealer Box” is an open-top roll-off container which holds a variety of solid wastes generated in part from contamination with a 2-part adhesive used in the Body Shop.

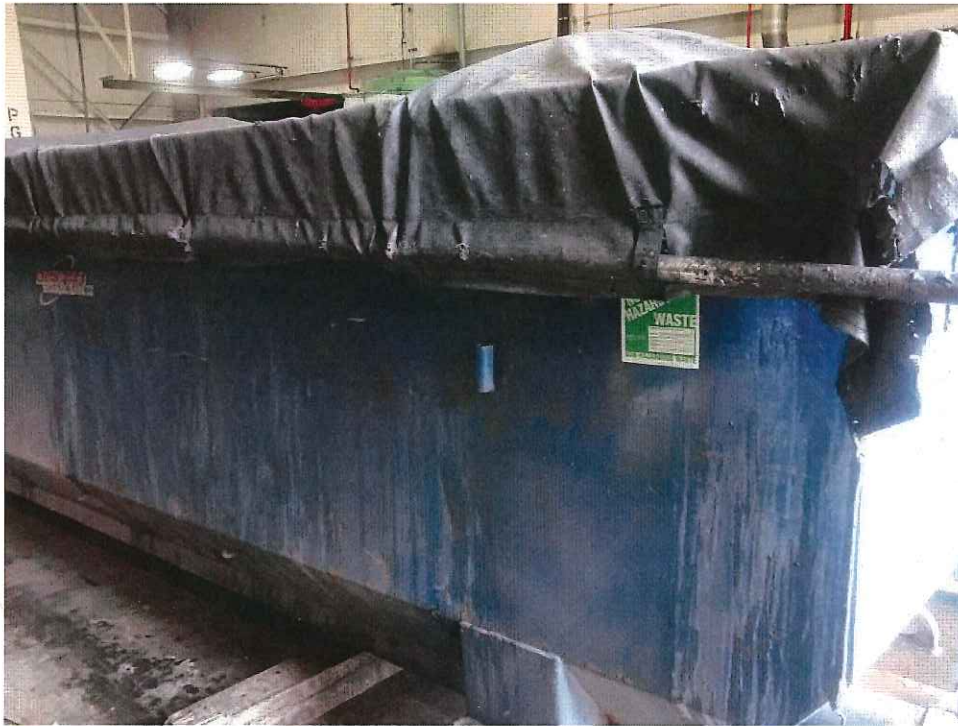




*Photograph 13 – A second pen-top roll off box was storing scrap tires that were to be recycled.*



*Photograph 14 – A third open-top roll-off box was storing scrap glass to be recycled.*

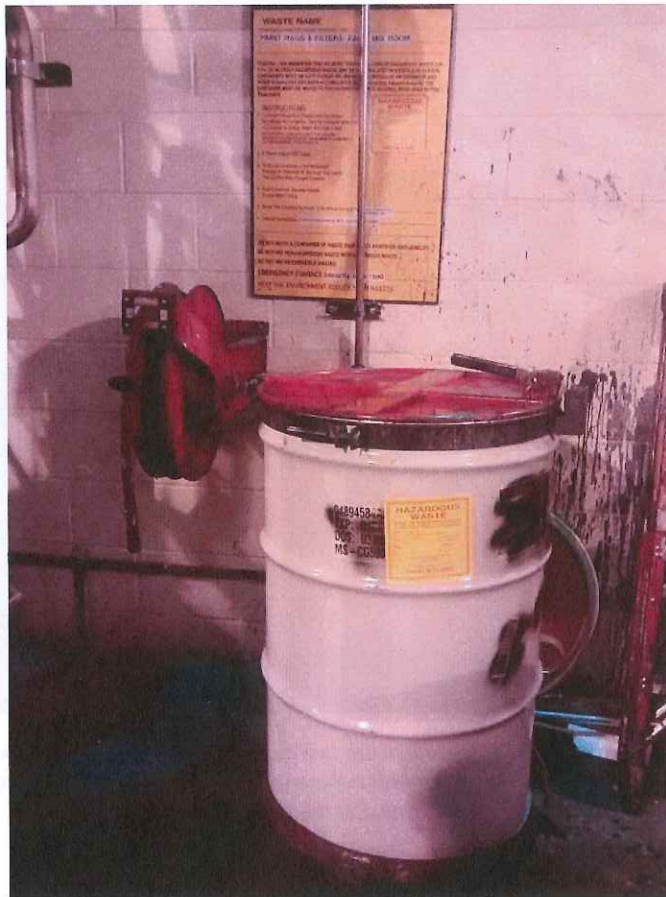


*Photograph 15 – A roll-off box in the paint department was used for storing and dewatering paint solids recovered from the paint booth water recirculation pit.*



*Photograph 16 – The 55-gallon drum on the left was accumulating paint-related waste in the “senior” paint mix room. The drum was labeled and closed. The 5-gallon bucket on the right was used for transferring waste to the 55-gallon drum. The bucket was empty.*





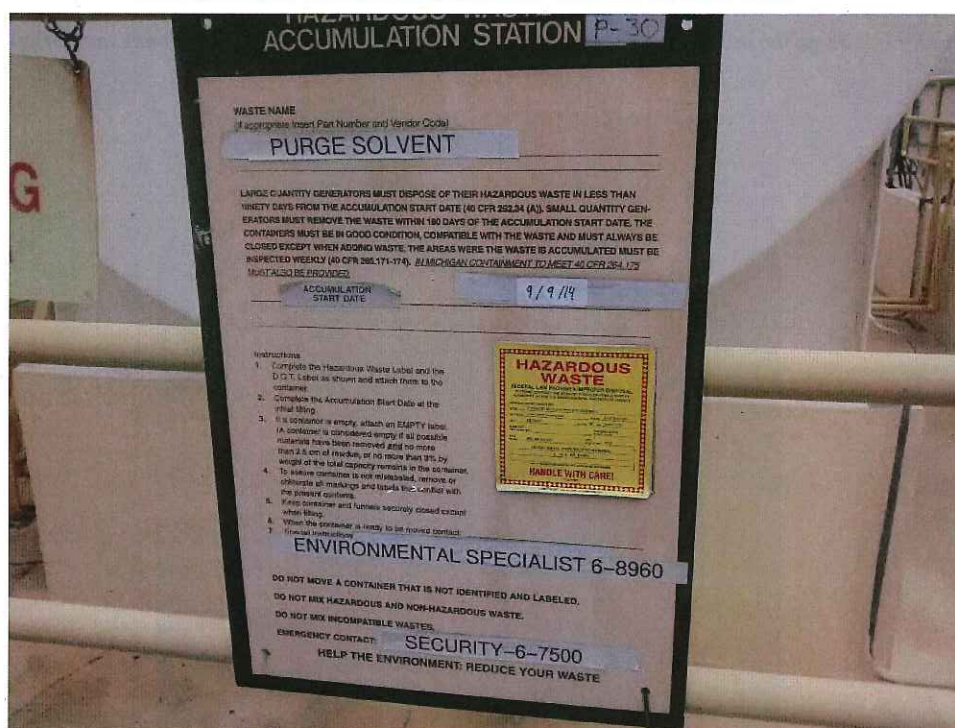
Photograph 17 – This 55-gallon drum of paint-related waste was located in the “junior” paint mix room. The container was labeled and closed.



Photograph 18 – This photograph of a purge pot was taken through a security glass window into an automated paint booth.



Photograph 19 – Hazardous Waste tanks 43A and 43B are two compartments of this one tank. The tank was labeled and appeared to be in good condition as did the secondary containment. The start date of accumulation was posted on the railing next to the tank.



Photograph 20 – This photograph is a close-up of the label and start date associated with the hazardous waste tank.

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# Appendix B

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## Checklists

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**Inspection Date:**

September 11-12, 2014

**Facility Name and ID Number:**

Chrysler Group, LLC

Jefferson North Assembly Plant

MID985569987

**Inspector:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

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Department of Environmental Quality  
**FULLY REGULATED GENERATOR (FRG) INSPECTION FORM**

Facility's Name Chrysler JEFFERSON NORTH ASSEMBLY PLANT Part 3 Rules  
Date 9-11/12-14 ID# MID 985569987 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Purge Solvent (0001)		
Paint related waste/gas (0001, 0018)		
Paint related waste (0001)		

\_\_\_ abbreviated

**FACILITY COMPLIANCE REQUIRED IN ALL AREAS**

**WASTE DETERMINATION (Rule 302: 40 CFR 262.11)**

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d): 40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	NI N/A
<b>IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)</b>			
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A

**MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)**

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(2)(b))	262B	<input type="checkbox"/>	NI N/A
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 <sup>rd</sup> signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A

**NOTE:** For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20)	262B	<input checked="" type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a)(b))			N/A
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A
<i>part of key performance indicators - Corporate Targets</i>			
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A



**LAND DISPOSAL RESTRICTION REQUIREMENTS**  
**WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))**

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A

**NOTE:** If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
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**OR**

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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**OR**

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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**OR**

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
d) manifest number associated with the shipment?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
e) waste analysis data, where available?	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A

**UNLESS**

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A

**NOTE:** An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

**NOTE:** Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A

**NOTE:** This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

**DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)**

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
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**TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)**

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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**BIENNIAL REPORT (Rule 308: 40 CFR 262.41)**

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	<input checked="" type="checkbox"/> NI <input type="checkbox"/> N/A

**PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)**

YES NO

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	262C	co. said <input checked="" type="checkbox"/> obsrvd <input checked="" type="checkbox"/> NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR 172 concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co. said <input checked="" type="checkbox"/> obsrvd <input checked="" type="checkbox"/> NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co. said <input checked="" type="checkbox"/> obsrvd <input checked="" type="checkbox"/> NI N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/> NI N/A

**ACCUMULATION TIME (Rule 306: 40 CFR 262.34)**

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input checked="" type="checkbox"/> NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input checked="" type="checkbox"/> NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input checked="" type="checkbox"/> NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input checked="" type="checkbox"/> NI N/A

**OR**

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7): 40 CFR 262.34(g))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8): 40 CFR 262.34(h))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10): 40 CFR 262.34(i))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A

*The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).*

f) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/> NI N/A
g) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/> NI N/A
h) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/> NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input checked="" type="checkbox"/> NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input checked="" type="checkbox"/> NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input checked="" type="checkbox"/> NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/> NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(ii))	262C	<input checked="" type="checkbox"/> NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input checked="" type="checkbox"/> NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A

*Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).*

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/> NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/> NI N/A
e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/> NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/> NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/> NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A

*Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.*

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
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a) impervious base free of cracks? (264.175(b)(1)) :	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

**NOTE:** Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer.</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

*Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16*  
**PERSONNEL TRAINING (265.16)**

42. Did personnel receive training? (265.16)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
43. Do personnel training records contain the following:		
a) job title? (265.16(d)(1))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) job descriptions? (265.16(d)(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
f) records of training? (265.16(d)(4))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

*Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.*  
**PREPAREDNESS AND PREVENTION (265.30-265.37)**

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable <b>only</b> if required (40 CFR 265.32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

*Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.*  
**CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)**

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
49. Does the contingency plan contain the following:		
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A







Department of Environmental Quality  
GENERATOR TANK INSPECTION FORM

Facility's Name Chrysler Jefferson North Assembly plant Part 3 Rules  
Date 9-11/12-14 ID# M10 985569987 1994 PA 451

\_\_\_\_ abbreviated

**FACILITY COMPLIANCE REQUIRED IN ALL AREAS**

**ALL TANK SYSTEMS ACCUMULATION TIME (Rule 306: 40 CFR 252.34)**

(NI - Not Inspected N/A - Not Applicable)

		YES	NO
1. Has more than 90 days elapsed since tank was emptied? (If yes, operating license required per Part 5 of Rules. (Rule 306(1): 40 CFR 262.34(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
2. Is each tank labeled or marked with the words "Hazardous Waste" (Rule 306 (1)(c): 40 CFR 252.34(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A

**NOTE:** Rule 306(1)(a)(ii) & 40 CFR 252.34(a)(1)(ii) refer to 265 Subpart J, except 265.197(c) and 265.200 & Rule 615, except Subrule (1).

**GENERAL OPERATING REQUIREMENTS (Rule 306: 40 CFR 265.194)**

3. Could wastes placed in tank system cause ruptures, leaks, corrosion or other failure? (265.194 (a))	GPT	<input checked="" type="checkbox"/>	NI N/A
4. Controls & practices to prevent spills & overflows must include: (265.194(b))			
a) spill prevention controls. (265.194(b)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) overfill prevention controls. (265.194(b)(2)).	GPT	<input checked="" type="checkbox"/>	NI N/A
c) freeboard in uncovered tanks to stop overtopping by wave or wind action or precipitation. (265.194 (b)(3)).	GPT	<input type="checkbox"/>	NI N/A

**NOTE:** Response to leaks, spills and disposition of leaking or unfit-for-use tank systems is in 40 CFR 265.196.

5. A tank system or secondary containment system from which there has been a leak, spill or which is unfit for use, is it:		<input type="checkbox"/>	NI N/A
a) removed from service immediately? (265.196)	GPT	<input type="checkbox"/>	NI N/A
b) completed requirements in 265.196(a-f)	GPT	<input type="checkbox"/>	NI N/A

**INSPECTIONS (Rule 306(1):40 CFR 265.195)**

6. Where present, has the facility inspected at least once each operating day: (265.195(a))			
a) discharge, overflow/spill control equipment (daily). (265.195(a)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) monitoring equipment data (daily). (265.195(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) above ground portion of tank system (daily). (265.195(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) materials and area around tank (daily). (265.195(a)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) are the inspections documented? (265.195 (c))	GPT	<input checked="" type="checkbox"/>	NI N/A
7. Must inspect cathodic protection system, if present, for in-ground tanks:			
a) cathodic protection within six months after initial installation (annually thereafter). (265.195 (b) (1))	GPT	<input type="checkbox"/>	NI N/A
b) impressed current inspected and/or tested at least bimonthly. (265.195 (b) (2))	GPT	<input type="checkbox"/>	NI N/A
c) are the inspections documented? (265.195(c))	GPT	<input type="checkbox"/>	NI N/A

**SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (Rule 306(1):40 CFR 265.198)**

8. Ignitable or reactive waste must not be placed in tanks unless:			
a) treated/mixed before or immediately after placed in the tank system, so: (265.198(a)(1))			
i) resulting mixture is no longer ignitable/reactive. (265.198(a)(1)(i))	GPT	<input type="checkbox"/>	NI N/A
ii) does not cause environmental or structural damage to tank systems. (265.198(a)(1)(ii))	GPT	<input type="checkbox"/>	NI N/A

OR

b) waste stored/treated so protected from igniting or reacting. (265.198(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
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OR

c) tank system is used solely for emergency. (265.198(1)(3))	GPT	<input type="checkbox"/>	NI N/A
9. Observes National Fire Protection Association's buffer zone for tanks w/ ignitable or reactive wastes? (265.198(b)) (See tables 2-1 through 2-6 of NFPA's Flammable & Combustible Liquids Code - 1977" to determine compliance)	GPT	<input checked="" type="checkbox"/>	NI N/A

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		YES	NO
10. Is the tank system designed, constructed, operated and maintained in conformance with requirements of Act 207, Michigan flammable liquid regulations. (Rule 615(4))	GPT	<input checked="" type="checkbox"/>	<input type="checkbox"/> NI N/A
11. Is the tank labeled in accordance with NFPA standard # 704? (Rule 615(5))	GPT	<input checked="" type="checkbox"/>	<input type="checkbox"/> NI N/A

**INCOMPATIBLE WASTE (Rule 306(1):40 CFR 265.199)**

12. Are incompatible wastes stored in separate tanks? (265.199(a)) (If not, the provisions of 265.17(b) apply).	GPT	<input type="checkbox"/> NI N/A
13. Tank decontaminated before hazardous waste placed in it that held incompatible waste, unless 265.17(b). (265.199(b)).	GPT	<input type="checkbox"/> NI N/A

**CLOSURE AND POST-CLOSURE (265.197)**

**NOTE:** At tank system closure refer to 265.197 for closure/post closure care, except 265.197(c).

14. If the tank system is closed, did the facility follow the requirements in 265.197? (265.197).	GPT	<input type="checkbox"/> NI N/A
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**EXISTING TANK SYSTEMS  
REQUIREMENTS FOR EXISTING TANK(S) CONTAINING LIQUID WASTE  
THAT DO NOT MEET THE REQUIREMENTS OF 265.193 (Rule 615)**

15. Are above ground tanks:		
a) paved, diked or cubed or otherwise enclosed to contain not less than 100% of the largest tank? (Rule 615(2)(a))	GPT	<input type="checkbox"/> NI N/A
b) incompatible waste or interconnected tanks must have 100% containment for each tank. (Rule 615(2)(a))	GPT	<input type="checkbox"/> NI N/A
16. Do underground tanks:		
a) have secondary containment and a leachate withdrawal system? (Rule 615(2)(b)(i))	GPT	<input type="checkbox"/> NI N/A
b) complete an inventory of wastes not less than twice a month? (Rule 615 (2)(b)(ii))	GPT	<input type="checkbox"/> NI N/A
c) leachate sampling analysis at least once per year (if b shows loss, sample within 24 hours). (Rule 615(2)(b)(iii))	GPT	<input type="checkbox"/> NI N/A

**Note:** If existing tanks do not have secondary containment meeting RCRA, the facility must assess the existing tank system's integrity, 265.191.

**Note:** The determination that secondary containment does or does not meet the standards in 265.193 can be made by the company. It does not require a certification by an independent engineer.

**Note:** Tanks w/out free liquids in a building w/ impermeable floor & tanks part of secondary containment system are exempt (265.190(a)&(b)).

**ASSESSMENT OF EXISTING TANK SYSTEM'S INTEGRITY (Rule 306(1):40 CFR 265.191)**

17. If existing tank system (before 7/14/86) does not meet the secondary containment requirements in 265.193, was an assessment made and certified by an independent engineer? (265.191)	GPT	<input type="checkbox"/> NI N/A
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**CONTAINMENT AND DETECTION OF RELEASES (Rule 306(1):40 CFR 265.193)**

18. Until an existing tank is upgraded to meet the secondary containment requirements in 265.193 has the facility: (265.193(i))		
a) for non-enterable underground tank, performed leak test meeting reqmnt of 265.191(b)(5) annually: (R 265.193(i)(1))	GPT	<input type="checkbox"/> NI N/A
b) for other than non-enterable underground tanks and ancillary equipment, the facility must:		
i) conduct an annual leak test that meets the requirements of 265.191(b)(5). (265.193(i)(2))	GPT	<input type="checkbox"/> NI N/A

**OR**

ii) an internal inspection or other tank integrity exam by an independent, qualified, reg. prof. engineer. (265.193(i)(2))	GPT	<input type="checkbox"/> NI N/A
19. Secondary containment & detection that meets the requirements, must be provided for: (265.193(a))		
a) new tank systems prior to being put into service (any tank installed after 7-14-86). (265.193(a)(1))	GPT	<input type="checkbox"/> NI N/A
b) existing tanks used for F020, F021, F022, F023, F026, F027 prior to 1/12/90. (265.193(a)(1))	GPT	<input type="checkbox"/> NI N/A
c) existing tanks w/ documented age before 1/12/90 or tanks 15 years of age, which is later. (265.293(a)(3)).	GPT	<input type="checkbox"/> NI N/A
d) existing tank system, w/out documented age, upgrades done by 1/12/96 unless facility is greater than 7 years in 1988, then containment provided before facility reaches 15 years or by 1/12/90 which is later. (265.193(a)(4))	GPT	<input type="checkbox"/> NI N/A
e) wastes which became hazardous waste after 1/12/87. (265.193(a)(5))	GPT	<input type="checkbox"/> NI N/A

**NEW TANK SYSTEMS AND UPGRADED EXISTING TANK SYSTEMS  
(Rule 306(1):40 CFR 265.193(c))**

20. Secondary containment and detection systems must have the following: (265.193(c))		
a) tank system constructed of compatible material with sufficient strength. (265.193(c)(1))	GPT	<input checked="" type="checkbox"/> NI N/A
b) adequate foundation/base. (265.193(c)(2))	GPT	<input checked="" type="checkbox"/> NI N/A
c) leak detection system designed/operated to detect leaks w/in 24 hours of earliest practical time. (265.193(c)(3)).	GPT	<input checked="" type="checkbox"/> NI N/A
d) sloped/drained & all liquid (leaks, precipitation) removed w/in 24 hours or in a timely manner. (265.193 (c)(4)).	GPT	<input checked="" type="checkbox"/> NI N/A
e) must include one or more of the following:		
i) a liner (external to tanks) & must satisfy the following requirements. (265.193(d)(1))		
A) 100% capacity of largest tank within its boundary. (265.193(1)(i))	GPT	<input checked="" type="checkbox"/> NI N/A

		YES	NO
B) prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(1)(ii))	GPT	<input checked="" type="checkbox"/>	NI N/A
C) free of cracks or gaps. (265.193(e)(1)(iii))	GPT	<input checked="" type="checkbox"/>	NI N/A
D) cover any area waste may come in contact with if released. (265.193(e)(1)(iv))	GPT	<input checked="" type="checkbox"/>	NI N/A

#### CEMENT LINERS ONLY

Note: If liner is cement then, must have, in addition, 265.193(e)(2)(iii & iv)

E) constructed with chemical resistant water stops in place at all joints. (25.193(e)(2)(iii))	GPT	<input checked="" type="checkbox"/>	NI N/A
F) impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GPT	<input checked="" type="checkbox"/>	NI N/A
ii) vault system & must satisfy the following requirements. (265.193(e)(2)(i-iv))(264.175(b)(3))			
A) 100% capacity of the largest tank within its boundary. (265.193(e)(2)(i))	GPT	<input type="checkbox"/>	NI N/A
B) prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(2)(ii))	GPT	<input type="checkbox"/>	NI N/A
C) constructed with chemical resistant water stops in place at all joints. (265.193(e)(2)(iii))	GPT	<input type="checkbox"/>	NI N/A
D) impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GPT	<input type="checkbox"/>	NI N/A
E) if ignitable or reactive, then provide against vapor formation and ignition. (265.193(e)(2)(v))	GPT	<input type="checkbox"/>	NI N/A
F) provide with exterior moisture barrier. (265.193(e)(2)(vi))	GPT	<input type="checkbox"/>	NI N/A
iii) double wall tanks & must satisfy the following requirements: (265.193(d)(3))			
A) designed as integral structure (inner tank with outer shell). (265.193(d)(3)(i))	GPT	<input type="checkbox"/>	NI N/A
B) protect metal surface for corrosion (interior and exterior). (265.193(e)(3)(ii))	GPT	<input type="checkbox"/>	NI N/A
C) capable of detecting releases within 24 hours. (265.193(e)(3)(iii))	GPT	<input type="checkbox"/>	NI N/A
f) ancillary equipment (note certain exclusions) must be provided with full secondary containment. (265.193)(f)	GPT	<input checked="" type="checkbox"/>	NI N/A

#### NEW TANK SYSTEMS

##### DESIGN AND INSTALLATION OF NEW TANK SYSTEMS OR COMPONENTS (265.192)

21. Facility obtained written assessment that was reviewed & certified (270.11(d)) by independent qualified registered professional engineer to include:			
a) design standards and considerations? (265.192(a)(1)&(5))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) hazard characteristics of the waste(s) to be handled? (265.192(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) determination by a corrosion expert, (if external shell of metal tank or metal part in contact with soil or water)? (265.192(a)(3))	GPT	<input type="checkbox"/>	NI N/A
d) if needed, design considerations for UST systems affected by vehicular traffic? (265.192(a)(4))	GPT	<input type="checkbox"/>	NI N/A
22. New tank/component & piping underground was backfilled w/non-corrosive, porous, homogeneous material & carefully compacted? (265.192(c))	GPT	<input type="checkbox"/>	NI N/A
23. All new tanks/ancillary equipment tested for tightness before covered, enclosed, put in use? (265.192(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
24. New tank system not tight, were repairs made before covered, enclosed, put in use? (265.192(d))	GPT	<input type="checkbox"/>	NI N/A
25. Is ancillary equipment supported/protected against damage & stress? (265.192(e)).	GPT	<input checked="" type="checkbox"/>	NI N/A
26. Corrosion protection provided? (265.192(f))	GPT	<input type="checkbox"/>	NI N/A
27. Field fabricated corrosion protection supervised by independent expert? (265.192(f))	GPT	<input type="checkbox"/>	NI N/A
28. Is written statement kept on file at the facility and certified? (265.192(g))	GPT	<input checked="" type="checkbox"/>	NI N/A

#### COMMENTS:

NO INSTALLATION ASSESSMENT. integrity - yes

P.E. Certification calls Tank 43A-B an existing tank though it was installed in 1991. Existing tanks are built prior to July 14, 1986. Did not have an installation assessment. No tightness test on file

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

CHRYSLER JEFFERSON NORTH  
ASSEMBLY PLANT MID 985 569287

## Inspection Checklist for Subpart CC: Air Emission Standards (Tanks)

**Applicability:** The air emission requirements apply to units subject to Subpart J \* unless any of the following apply:

Item # 40 CFR:

\*Note: CESQG's and SQG's are exempt

CC-T1	265.1	Do any of the following general exclusions apply? If yes, please circle.		YES	<input checked="" type="radio"/> NO
1. Wastewater treatment units -265.1(c)(10)      4. Elementary neutralization units -265.1(c)(10) 2. Emergency spill management units. -265.1(c)(11)      5. Totally enclosed treatment units. -265.1(c)(9) 3. Hazardous waste recycling units. -265.1(c)(6)      6. Satellite accumulation areas. -265.1(c)(7) - 262.34(c)(1)					
CC-T2	265.1080	Do any of the following exceptions apply? If yes, please circle.		YES	<input checked="" type="radio"/> NO
1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. -265.1080(b)(1) 2. The unit has stopped adding waste and is undergoing closure pursuant to an approved closure plan. -265.1080(b)(3) 3. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. -265.1080(b)(5) 4. The unit is used solely to manage radioactive mixed waste. -265.1080(b)(6) 5. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. -(b)(7) 6. The unit operates with a process vent as defined in 264.1031, regulated under Subpart AA. -265.1080(b)(8)					
CC-T3	265.1080(d)	Administrative Stay for Organic Peroxide Waste:		YES	<input checked="" type="radio"/> NO
If the unit receives hazardous waste generated by organic peroxide manufacture, and the owner/operator has met the conditions as set forth in 265.1080(d), the requirements under Subpart CC are administratively stayed, <i>except for the record keeping requirements</i> which additionally include the notification requirement as given in 265.1080(d)(3).					
CC-T4	265.1083	Do any of the following exemptions apply? If yes, please circle.		YES	<input checked="" type="radio"/> NO
<b>General Standards:</b> The owner/operator must control air emissions from waste management units except the unit is exempt if: 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required by 265.1084; see CC-T5). -265.1083(c)(1) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable processes. -265.1083(c)(2) 3. The unit is a tank used for certain biological treatment consistent with 265.1087(c)(2)(iv). -265.1083(c)(3) 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits given in 268.40 or has been treated using the LDR treatment technology specific for the waste (specified in 268.42). -265.1083(c)(4) 5. The unit is a tank within an enclosure used for bulk feed to an incinerator and meets certain requirements. -265.1083(c)(5)					
CC-T5	265.1084	Waste Determination	<input checked="" type="radio"/> OK	Determination Not Needed	Determination Needed
Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <b>not</b> needed for waste managed in tanks which meet Subpart CC standards. It may be necessary to evaluate tank management prior to requiring VO concentration determination.					
<b>TANK MANAGEMENT</b>					
Level 1 tank controls apply only to a fixed-roof tank in which the maximum vapor pressure of organic waste is less than that listed below for each tank design capacity, contents are not heated above the temperature of vapor pressure determination, and no waste stabilization is conducted in the tank. -265.1085(b)(1) Tanks that exceed Level 1 criteria must use Level 2 controls; tanks that do not exceed Level 1 criteria may use Level 2 controls. The five design options for Level 2 controls are given below; vented fixed-roof tanks are the most common. -265.1085(b)(2)					
Tank Design Capacity	Level 1 pressure limits	Level 1	Level 2		
≥151m <sup>3</sup> / 40,000 gal	< 5.2 kPa / 0.75 psi	Fixed-roof tanks -265.1085(c)(1) through (c)(4) -265.1085(d)	Fixed-roof tanks vented to control device	-265.1085(g)	
< 151 m <sup>3</sup> and ≥ 75 m <sup>3</sup>	< 27.6 kPa / 4.0 psi		External floating roof tanks	- 265.1085(f)	
< 75 m <sup>3</sup> / 20,000 gal	< 76.6 kPa / 11.1 psi		Fixed-roof with internal floating roof	- 265.1085(e)	
			Enclosure vented to combustion device	- 265.1085(i)	
			Pressure tank	- 265.1085(h)	

15,000 gallons total  
7,500 per tank 43A and 43B

MOV P = 0.1053 psi

265.1085(c)

## Level 1 Controls for Fixed-Roof Tanks

NA=Not Applicable NI=Not Inspected OK= In Compliance DF= Deficiency

CC-T6	265.1085(c)(1)	Vapor Pressure Determination	NA	NI	OK	DF
Has the owner/operator determined the maximum organic vapor pressure of the waste in the tank: 265.1085(c)(1) by direct measurement or by knowledge? -265.1084(c)(3,4)					YES	NO
Is the determination acceptable?					YES	NO
Does waste in tank exceed vapor pressure threshold for tank size? (If yes must use Level 2 Controls)					YES	NO
CC-T7	265.1085(c)(2)	Tank Design Specifications	NA	NI	OK	DF
The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the hazardous waste in the tank; shall be installed such that there are no visible cracks, holes, gaps or other open spaces between roof and tank wall / closure device and roof. Inspect the fixed roof and closure devices of each tank or a representative percentage of multiple tanks; list and photograph defects at each.						
Tank #	Defect(s)	Photo #	Notes			
Is each opening in the fixed roof (sampling port, conservation vent, level indicator, safety valve, etc.): 265.1085(c)(2)(i)(A) equipped with a closure device such that when closed there are no visible cracks, holes, gaps or other open spaces? or; 265.1085(c)(2)(i)(B) connected via a closed vent system to a control device? (If YES see Level 2 Controls checklist below)					YES	NO
					YES	NO
CC-T8	265.1085(j)	Waste transfer requirements	NA	NI	OK	DF
Transfer of hazardous waste to the tank from another tank subject to 265.1085 or surface impoundment subject to 265.1086 shall be conducted using continuous hard piping or other closed system, to prevent exposure of waste to atmosphere; except under conditions given in 265.1085(j)(2).						
CC-T9	265.1085(c)(3)	Operating requirements	NA	NI	OK	DF
Cover and closure devices shall be closed at all times except when performing routine inspections, sampling, maintenance and cleaning. Opening of a pressure/vacuum relief valve, conservation vent or similar device is allowed during normal operations to maintain tank pressure within design specifications. Opening of a safety device is allowed at any time.						
Are pressure/vacuum relief valves and conservation vents designed to operate with NDE when secured in closed position?					YES	NO
Are the opening settings of these devices consistent with the manufacturer's recommended operating ranges?					YES	NO
What are the pressure settings of these devices and how do they compare with Level 1 vapor pressure limits?					OK	DF
CC-T10	265.1085(c)(4)	Inspection requirements	NA	NI	OK	DF
The fixed roof and closure devices shall be visually inspected for defects initially, on or before December 12, 1996, or when first in service and thereafter at least annually, according to written plan; except when unsafe, and delay conditions are met. Buried parts of tank need not be inspected TSDs: The inspection plans must be incorporated into the overall facility inspection plan as per 265.15.						
CC-T11	265.1085(k)	Repair requirements	NA	NI	OK	DF
Owner/operator shall make first efforts at repair of each defect detected during an inspection no later than 5 calendar days after detection; repairs shall be completed as soon as possible but no later than 45 calendar days after detection, except as provided in 265.1085(k)(2).						



[illegible]

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CC-T Checklist, 7/1/98



## Department of Environmental Quality, Waste and Hazardous Materials Division

**USED OIL INSPECTION FORM – GENERATORS**Facility's Name Chrysler Jefferson North Assembly Plant Part 8 RulesDate 9-11/12-14 ID# WID 985569987 1994 PA 451**Note:** Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109**APPLICABILITY (Rule 809)**

NI – Not Inspected, N/A – Not Applicable

YES NO

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate <u>used oil</u> and any of the following materials which are subject to regulation as used oil:		<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
d) mixture of used oil and fuel? (Rule 809(1)(d))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f))			
i) maximum arsenic concentration of 5ppm	UOA	<input type="checkbox"/>	<input type="checkbox"/>
ii) maximum cadmium concentration of 2ppm	UOA	<input type="checkbox"/>	<input type="checkbox"/>
iii) maximum chromium concentration of 10ppm	UOA	<input type="checkbox"/>	<input type="checkbox"/>
iv) maximum lead concentration of 100ppm	UOA	<input type="checkbox"/>	<input type="checkbox"/>
v) minimum flash point of 100 degrees Fahrenheit	UOA	<input type="checkbox"/>	<input type="checkbox"/>
vi) maximum total halogen concentration of 4,000ppm	UOA	<input type="checkbox"/>	<input type="checkbox"/>
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule 809(2)(b)(ii))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed? (Rule 809(2)(c))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809(2)(g))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809(2)(j))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
n) tank bottoms from stock tanks w/ mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule 809(2)(o))	UOA	<input type="checkbox"/>	<input type="checkbox"/>
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## GENERATOR REQUIREMENTS (Rule 810)

**NOTE:** Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25 gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4))	UOA	<input checked="" type="checkbox"/>	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	<input checked="" type="checkbox"/>	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	<input type="checkbox"/>	NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	<input type="checkbox"/>	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	<input type="checkbox"/>	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	<input type="checkbox"/>	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	<input type="checkbox"/>	NI N/A

## GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER (Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	<input type="checkbox"/>	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour? (40 CFR 279.23(b))	UOA	<input type="checkbox"/>	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	<input type="checkbox"/>	NI N/A

## GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL (Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	<input checked="" type="checkbox"/>	NI N/A
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OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	<input type="checkbox"/>	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	<input type="checkbox"/>	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	<input type="checkbox"/>	NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	<input type="checkbox"/>	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	<input type="checkbox"/>	NI N/A

## USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	<input type="checkbox"/>	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	<input checked="" type="checkbox"/>	NI N/A

**COMMENTS:-**

**Department of Environmental Quality  
UNIVERSAL WASTE SMALL QUANTITY HANDLER  
(SQH) INSPECTION**

Facility Name CHRISTIE JEFFERSON NORTH ASSEMBLY PLANT Part 2 Rules

Date 9-11/12-14 I.D. # MID 985569987 1994 PA 451

*SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.*

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

**PROHIBITIONS (Rule 228(4): 40 CFR 273.11)**

YES NO

1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/> NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input checked="" type="checkbox"/> NI N/A

**WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)**

**ANTIFREEZE: (Rule 228(4))**

*COMBINED  
W/ USED OIL*

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input checked="" type="checkbox"/> NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input type="checkbox"/> NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input type="checkbox"/> NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input type="checkbox"/> NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input type="checkbox"/> NI N/A

**BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)**

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/> NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input type="checkbox"/> NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input type="checkbox"/> NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/> NI N/A

**CONSUMER ELECTRONICS: (Rule 228(4))**

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input checked="" type="checkbox"/> NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input type="checkbox"/> NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i)); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input type="checkbox"/> NI N/A

**ELECTRIC LAMPS: (Rule 228(4) ; 273.13(c); 273.14(d))****QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? ( <b>universal waste electric lamps shall not be crushed or broken under MI rule</b> ) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input type="checkbox"/> NI N/A

**MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14)****QTY HANDLED:**

NONE OBSERVED / NONE GENERATED

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

**PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)****QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? <b>[USE TANK CHECKLIST]</b> (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) <b>[See 273.14(c) if 273.14(b) not possible]</b>	273.B	<input type="checkbox"/> NI N/A

← NOT OBSERVED, BUT DO GENERATE  
**PHARMACEUTICALS: (Rule 228(4))**

**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input type="checkbox"/> <u>NI</u> N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> <u>NI</u> N/A

#### ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> <u>NI</u> N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> <u>NI</u> N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input type="checkbox"/> <u>NI</u> N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> <u>NI</u> N/A

#### EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
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#### RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A

#### OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input type="checkbox"/> <u>NI</u> N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> <u>NI</u> N/A

#### EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> <u>NI</u> N/A

**TRANSPORTER** (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <b>Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s."</b> <b>nor have waste added to USDOT proper shipping name.</b> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

**COMMENTS:**

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.